Mackenzie Timber Supply Area
Timber Supply Review

Summary of Public Input

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This is a summary of the public input received on the Timber Supply Review in the Mackenzie Timber Supply Area. This summary does not assess the feasibility or validity of the input or whether it relates to the clearly defined mandate of the chief forester in the allowable annual cut determination.

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Mackenzie Timber Supply Area

Background

As part of the review of timber supply in the Mackenzie Timber Supply Area (TSA), two opportunities were provided for public input. The first followed release of the Mackenzie TSA *Data Package* and *Information Report* in April 2000. The *Information Report* was a non-technical summary of the draft data and management assumptions that were to be applied in reviewing the timber supply for the Mackenzie TSA. A 30-day review period, ending May 15, 2000, was provided for the public to comment on these documents.

On April 11, 2001, the British Columbia Forest Service released the *2001 Mackenzie Timber Supply Area Analysis Report* and *Public Discussion Paper*. The public was encouraged to review and comment on the accuracy of the information in these documents and to provide additional information during the 45-day review period that ended May 28, 2001.

This report summarizes the input received during both public review periods. This information was provided to the chief forester for his consideration when he reviewed the allowable annual cut (AAC) for the Mackenzie TSA. The first section of this summary outlines the public review process implemented by the Forest Service, and describes the types of public input received. The second section summarizes the public input in sufficient detail to indicate the range of input received. The original submissions (with personal identifiers removed in accordance with the *Freedom of Information and Protection of Privacy Act*) can be reviewed at the Mackenzie Forest District office.

Public Review Process and Response

Mackenzie District staff actively solicited public input on the Timber Supply Review in the Mackenzie TSA through the following actions:

- the *Information Report*, *Data Package*, *Public Discussion Paper* and *Analysis Report* were available at the district office in Mackenzie and the regional office in Prince George.
- copies of the documents were mailed on request.
- newspaper and radio advertisements were placed, advising of the availability of all documents for review by the public and offering presentations on request.
- a presentation on the *Analysis Report* was made to the Mackenzie District Council.

The Mackenzie Forest District received four written submissions on the *Data Package* and five submissions on the *Analysis Report* (see Appendix 1).

Public Input

In this section, public input on the information presented in the Timber Supply Review documents for the Mackenzie TSA is summarized under the following headings:

- Data Package (and Information Report)
- Timber Supply Area Analysis Report (and Public Discussion Paper)
- Other comments

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Data Package

Land Base Factors

Two forest industry submissions comment on the statement in the *Data Package* (section 5.1) that no opportunities exist to increase the size of the timber harvesting land base (THLB). They say this statement is misleading at best and suggests a conclusion has already been reached before sensitivity analyses on factors affecting the THLB are completed.

Slocan Forest Products (Slocan) says with the current appraisal system and continuing road development, the separation of the TSA into near and far zones seems redundant. The company says all stands that meet minimum volume requirements should be included in the THLB, and recommends including all or a portion of the excluded conventional harvest stands in the far zone.

With regard to deductions from the land base for Environmentally Sensitive Areas (ESAs), two industry submissions say the percentage reductions seem arbitrary and excessive. They suggest these reductions need to be reviewed based on harvesting history. Slocan expresses concern about duplication and double-counting and asks for the protocol used to ensure this doesn't occur. Slocan also suggests the use of recent terrain stability mapping to update sensitive soil ESAs.

Donohue Forest Products (Donohue) says the factors used to exclude certain types of forests from the THLB do not reflect significant changes in planning since the last Timber Supply Review. The company says with the concentration on seral stage and patch size distribution for regulating harvest flow, older stands are now included. Donohue provides detail on their harvesting performance in excluded stands and recommends that age class 5 and 6 balsam-spruce stands and certain marginal types be included in the timber supply analysis.

Two forest industry submissions say the assumptions of road widths removed from the THLB are excessive, and recommend a 12-metre width for non-status roads and 10-metre width for operational roads. Slocan also suggests a 16-metre width for mainline roads.

An individual submission says parks and Special Management Zones resulting from the Mackenzie Land and Resource Management Plan (LRMP) must be considered in estimating the size of the land base.

Forest Inventory

Three submissions comment on in the lack of complete inventory information for this TSA.

An individual says if the Forest Service is not going to inventory the northern part of the TSA, then it should either be removed or a sensitivity analysis should examine the impact of harvesting for 25 years at a rate based on an inventory that's never been determined.

Two forest industry submissions say it's misleading to show the forest cover inventory vintage as 1999, when it is merely a computer-modeled update of information collected in 1973. They also question whether updated information on biogeoclimatic classifications in the TSA will be used.

Expected Productivity

An individual submission says the model used to predict volumes for existing stands is based on data from all over the province and a recent audit showed that actual volumes are about 90 per cent of predicted volumes. Similarly, the model for regenerated stands is not based on local information and productivity estimates are likely high due to the northern location of this TSA.

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Not Satisfactorily Restocked Areas

Donohue says the area estimated to be Not Satisfactorily Restocked under the Small Business Program seems excessively high and asks for verification of this number.

Silviculture Systems

Two forest industry submissions say the ratio of managed to unmanaged stands aged 13 to 20 years should be 80-90 per cent managed and 10-20 per cent unmanaged, since significant planting began in the early 1980s. Slocan maintains that all harvested areas are managed so use of the term unmanaged may not be appropriate.

Unsalvaged Losses

Two forest industry submissions question the estimates of unsalvaged losses and ask to see the information used so proper review comments can be provided. Slocan wants to ensure the time frame used is representative of average conditions and the volume losses represent only losses within the THLB. Slocan also recommends modeling a reduction in unsalvaged losses as older stands are harvested.

An individual submission notes the estimate of losses represents about six per cent of the current AAC. While this does not cause significant planning constraints now, if second pass impacts are severe the overall impact should be considered now.

Forest Cover

The submission from the Ministry of Environment, Lands and Parks (MELP) says the green-up height used in the Integrated Resource Management zone should be three metres, not two. MELP says reducing the height requires approval by the designated environmental official and this has not occurred. MELP notes that when the current definition is applied to a plantation, the effective green-up height is around 2.4 metres, demonstrating the difference between the legal definition and how it's implemented on the ground.

Two forest industry submissions ask for clarification as to what specific forest cover objectives will be met by forests that do not contribute to timber supply. Slocan says forested areas outside the THLB should be the first areas used to meet forest cover objectives, and this should be a firm commitment in the base case analysis.

Visually Sensitive Areas

Donohue says the reference to the eight known scenic areas should be clarified to ensure the public understands they are recommended but not established under the Forest Practices Code.

Biodiversity and Riparian Management

Three submissions question the use of three map sheets as the basis for estimating the riparian netdowns. Donohue says a minimum sample of five per cent of map sheets should be assessed to determine an appropriate netdown. Slocan says until more reliable information is available, the 2.1 per cent estimate for short-term Code-related riparian impacts should be used in the base case. Slocan also recommends that any reductions to timber supply from riparian reserves be used to meet wildlife tree patch objectives where possible.

Donohue notes that the reductions for biodiversity and riparian management exceed the 4.1 per cent target set by the chief forester for Code impacts. An individual submission says the reductions are likely realistic and should not be considered conservative.

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Wildlife Management

MELP says that because the LRMP has not been approved, all the deferred wildlife habitat areas identified in the previous Timber Supply Review should remain as deferred.

Two forest industry submissions question the approach for estimating the netdown for wildlife tree patches (WTPs). Donohue says if the sample of silviculture prescriptions identified an average WTP retention of 3.7 per cent, then the residual level should be no higher than 1.85 per cent. Slocan recommends using a maximum of a two per cent netdown, noting that numbers from silviculture prescriptions do not reflect the new policy that a maximum of 50 per cent of WTPs should be located in the THLB. Both companies express the opinion that WTP requirements could be achieved outside the THLB, requiring no netdown.

First Nations

An individual submission says the McLeod Lake Treaty 8 Settlement should be incorporated in the analysis as it has been ratified. As well, this individual suggests that an analysis of timber in the northern third of the TSA must consider First Nations issues in the Ingenika River and Fort Ware areas, and an area reduction should be considered.

Timber Supply Area Analysis Report

Land Base Factors

An individual submission expresses concern about the 25 per cent increase in the size of the THLB from the *Data Package* to the *Analysis Report*, especially since no additional field data was collected and this is a net increase after the removal of 1.78 million hectares of protected area. Accomplishing this increase by reducing the inoperable area to 0.3 per cent of the forested land base is not realistic, according to this submission. Based on experience in the TSA, this individual says the inoperable (not including high elevation stands and riparian areas) would be closer to five per cent.

The individual submission says a significant number of areas in the THLB are high elevation balsam stands, much of them in areas previously considered uneconomical. Without actual field and economic analysis, designation of these stands as more than 75 per cent operable may be premature, this individual says, noting that inventory labels may be inaccurate and these stands are typically snowbound for at least seven months of the year.

Forest Inventory

Slocan expresses agreement with the statement in the *Analysis Report* that the "existing inventory may overestimate volumes by more than 10%; however, more detailed assessment is needed to verify the results." Donohue says the vintage of the inventory is an ongoing concern that needs to be addressed.

Productivity Estimates

Slocan says the base case forecast implies an annual growth rate of 2.39 cubic metres per hectare per year which they say seems conservative and should be field-verified.

Donohue says the sensitivity of timber volume estimates for both managed and unmanaged stands requires field validation, and expresses concern that very little data is used in the preparation of volume estimates.

An individual submission expresses concern that growth-and-yield models overestimate volumes, since the Mackenzie TSA is at the northern end of the data set. This individual notes that an audit of unmanaged forest volumes showed the model's predictions were 10 per cent higher than actual volumes, and that no similar audit was done for managed stands.

Riparian Management

Donohue says the sample size and methods used to calculate the netdown for riparian management need further work before the next Timber Supply Review.

Unsalvaged Losses

Slocan says losses to fire and pests seem low given recent attacks by the balsam bark beetle and the spruce budworm, especially in the east-central portion of the TSA.

Donohue says estimating unsalvaged losses due to fire is relatively simple, but other losses are more difficult to quantify. The company says the statement in the *Analysis Report* that the effects of budworm damage were factored into the yield curves for unmanaged stands is difficult to accept since there are very few data sources available to validate any changes.

Harvest Schedule

Donohue says in future timber supply analyses, the 'oldest first' rule must be re-examined to ensure it applies following implementation of biodiversity guidelines.

Mill Requirements

Timberline Consultants, writing on behalf of Ainsworth Lumber Co., notes the company's intent to pursue licences to harvest deciduous volume within the Mackenzie TSA. The consultants carried out a deciduous resource study and the results demonstrate that significantly more area is suitable for deciduous management than currently identified in the timber supply analysis, including five units that are candidates for an area-based tenure in the southern third of the TSA.

Ainsworth Lumber Co. says they are working to develop partnerships with local hardwood users that would ensure they have a secure supply of sawlogs and that the residual pulp-grade fibre would be available for Ainsworth's OSB facility in 100 Mile House. The company asks that their intentions be considered to ensure the full supply of the hardwood resource is recognized.

Other Comments

Most submissions comment on factors or issues other than those specifically covered by Timber Supply Review documents. These comments are summarized in this section.

Timber Supply Review Process

The primary area of concern regarding the process is the lack of reliable inventory data. Slocan says the inventories require an extensive update to create a greater level of confidence in the base case and enable an accurate assessment of timber supply and risk factors. Both forest industry submissions say government must ensure a vegetation resources inventory is completed and validated in time for the next Timber Supply Review. As well Donohue says a field evaluation of yield estimates and a review of unsalvaged losses are needed.

Donohue asks the status of the three tasks identified in the last Timber Supply Review that were to be completed by this one. The company also says the *Data Package* does not provide sufficient information to allow a reasonable assessment of the data and assumptions, and 30 days is not an adequate time period.

Harvest Levels

Three submissions comment on the harvest level for the Mackenzie TSA. Slocan suggests that, given little change in the data from the last Timber Supply Review, the current AAC be maintained. Timberline urges the Ministry of Forests to consider Ainsworth's interest and increase the deciduous partition, based on revised merchantability cutoffs, increased demands on other deciduous supplies, and

sustainable management of the resource.

An individual submission identifies a number of downward pressures on timber supply, including the estimate of inoperable ground, uncertainty about high elevation inventory labels, and overestimates of stand volumes and yields. This submission says to continue harvesting at the current rate, given these uncertainties, has the potential to create a large timber shortfall in the coming decades.

Appendix 1

Submissions received by the Mackenzie Forest District

Submissions received on the Data Package

Forest industry

Slocan Forest Products Ltd.
Donohue Forest Products Inc.

Consultants

One submission

Government agencies

Ministry of Environment, Lands and Parks

Submissions received on the Timber Supply Analysis Report

Forest industry

Donohue Forest Products Inc.
Slocan Forest Products Ltd.
Ainsworth Lumber Co. Ltd.
Timberline Forest Inventory Consultants Ltd.

Consultants

One submission